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16 || Attorneys for Plaintiffs

¹⁷ LIST OF COUNSEL CONTINUED ON SECOND PAGE

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

20 GIUSEPPE PAMPENA, on behalf of
21 himself and all others similarly situated.

CASE NO. 3:22-CV-05937-CRB

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DISCOVERY
DEADLINE TO DEPOSE DEFENDANT**

Judge: Hon. Charles R. Breyer

Magistrate Judge: Hon. Donna M. Ryu

22 Plaintiff,

VS.

25 | VS.

Plaintiff.

Z+ ELON R. MUSK,

Defendant.

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18 *Attorneys for Defendant Elon Musk*

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STIPULATION AND [PROPOSED] ORDER

Pursuant to Civil Local Rule 37-3, the parties, upon reaching agreement to the terms set forth below, jointly stipulate regarding the deposition of Defendant Elon Musk.

WHEREAS, the fact discovery cut-off in this case is March 31, 2025 (ECF 121);

WHEREAS, Defendant informed Plaintiffs that he is unavailable to appear for deposition prior to the March 31, 2025 discovery cut-off, but is available to appear for deposition on April 3, 2025 in Washington, D.C.;

WHEREAS, the parties have met and conferred, and for good cause, subject to the Court's approval below, agreed that (1) Defendant's deposition may be taken on April 3, 2025, after the March 31, 2025 discovery cut-off, and (2) Plaintiffs may file any motion concerning Defendant's deposition after the March 31, 2025 discovery cut-off, while the remaining deadlines in this case would be unaffected.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by the parties hereto, through their undersigned counsel, subject to the approval of the Court:

- 1) The fact discovery cut-off shall be extended for the limited purpose of taking Defendant's deposition, and for any motion that Plaintiffs may file relating to Defendant's deposition.
 - 2) Defendant's Deposition shall be taken on April 3, 2025, tentatively starting at 9:00 a.m., at a location to be determined in Washington, D.C.

IT IS HEREBY STIPULATED AND AGREED.

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2 DATED: March 6, 2025

3 */s/ Alex Bergjans*

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24 */s/ Francis A. Bottini*

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26 *Attorneys for Plaintiff*

1 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

2 I, Tyson C. Redenbarger, attest that concurrence in the filing of this document has been
3 obtained from the other signatories. I declare under penalty of perjury under the laws of the United
4 States of America that the foregoing is true and correct.

5 Executed this 6th day of March 2025 at Burlingame, California.

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7 By /s/ Tyson C. Redenbarger
8 Tyson C. Redenbarger

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1 **[PROPOSED] ORDER**

2 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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4 Dated: _____

By: _____

5 HONORABLE DONNA M. RYU
6 UNITED STATES MAGISTRATE JUDGE
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